

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America
v.

JERMAINE DORSEY

Case No. 1:24-mj-299

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/8/2024 - 4/17/2024 in the county of Hamilton in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 933
18 U.S.C. § 371
18 U.S.C. § 922(o)

Trafficking in Firearms
Conspiracy
Possession of a Machine Gun

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.

William D. Crayner
Complainant's signature

William D. Crayner, Special Agent, ATF
Printed name and title

Sworn to before me and signed in my presence.
via FaceTime video

Date: **Apr 24, 2024**

City and state: Cincinnati, Ohio

Karen L. Litkovitz
Karen L. Litkovitz
United States Magistrate Judge



AFFIDAVIT

Now comes William D. Crayner, Special Agent, Alcohol, Tobacco, Firearms, and Explosives (ATF), being duly sworn, deposes and states the following:

1. I am a Special Agent (“SA”) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), and have been so employed since December 2018. As a part of my training with the ATF, I graduated from the Federal Law Enforcement Training Center, Criminal Investigator School, located in Glynco, Georgia. I also graduated from the ATF Special Agent Basic Training Academy, located in Glynco, Georgia, in June of 2019.

2. In my career with ATF, I have been assigned to the Cincinnati Field Office in the Southern Judicial District of Ohio. Prior to my employment with ATF, I was a member of the United States Secret Service in Washington D.C. where I served as a member of the Uniformed Division under the Presidential Protective Division. I was employed in that capacity from July of 2010 to February of 2015. I was also a member of the Carmel Police Department in Carmel, IN from February 2015 to December of 2018. I was assigned to the Operations Division at the Carmel Police Department and took part in various criminal investigations during my tenure. I have received additional training in several areas of law enforcement, including but not limited to gang investigations, narcotics interdiction and investigation, and firearms interdiction and investigation. I am also a graduate of Purdue University where I received a bachelor’s degree in law and Society in 2008. I have received training in narcotics, gang, firearms, and explosives investigative techniques, as well as received training in electronic surveillance methods. I have participated in numerous investigations involving the illegal possession of

firearms, explosives and firearms related violent crime. I have also been involved in the investigation of several National Integrated Ballistics Network (NIBIN) NIBIN¹ leads related to violent crimes in Cincinnati, Ohio that were committed by known and unknown person(s). I am also familiar with the Federal Explosives Law and Regulations, including the Safe Explosives Act of 2002.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrants and does not set forth all of my knowledge about this matter.

4. This affidavit is submitted in support of an application for criminal complaint against, and arrest warrant for, Jermaine DORSEY, Diajonte BANKS and Josiah WASHINGTON. Based on the information stated below, I submit that there is probable cause to believe that on or about April 8, 2024, through April 17, 2024, DORSEY, BANKS and WASHINGTON trafficked and conspired to traffic in firearms in violation of 18 U.S.C. § 933 – Trafficking in Firearms, 18 U.S.C. §371 – Conspiracy in the Southern District of Ohio. I also submit that there is probable cause to believe that on

¹ The National Integrated Ballistics Network (NIBIN) is a nationwide data network administered by the Bureau of Alcohol Tobacco and Firearms (ATF) that is comprised of 3-dimensional microscopic images of shell casings collected from crime scenes and test fire cartridges generated from recovered crime guns by law enforcement agencies across the country. These crime scene and test fire cartridges are collected, imaged, and submitted by the respective agencies for comparison to existing submissions contained within NIBIN. NIBIN correlates these submissions into likely matches that are subsequently verified by a NIBIN examiner, and subsequently subjected to a peer-review process, that determines multiple shell casings were generated by the same firearm which resulted in unique tooling marks and characteristics being transferred from the firearm to each shell casing. This information results in the publication of an investigative lead showing commonalities between each crime event.

or about April 8, 2024, and April 17, 2024, DORSEY was in possession of a machine gun in violation of 18 U.S.C. 922(o) – Possession of a Machine gun, in the Southern District of Ohio.

PROBABLE CAUSE

A. Introduction

5. The United States is conducting a criminal investigation of JERMAINE DORSEY for suspected violations of 18 USC § 922(o) – Possession of a Machine Gun, and 18 USC § 933 – Trafficking in Firearms, and 18 U.S.C. § 371 - Conspiracy, along with Diajonte BANKS and Josiah WASHINGTON for suspected violations of 18 U.S.C. 933 – Trafficking in Firearms and 18 U.S.C. § 371 - Conspiracy.

B. On April 8, 2024, an ATF Undercover Special Agent ATF Confidential Informant purchased a firearm and a machinegun conversion device from JERMAINE DORSEY.

6. On April 8, 2024, ATF Special Agent 6134 (SA-6134), acting in an undercover capacity, and Confidential Informant 31618 (CI-31618) agreed to meet DORSEY at 1550 Queen City Avenue, Cincinnati, OH. The meeting with DORSEY was for the prearranged purchase of a firearm and a machinegun conversion device for one thousand one hundred dollars (\$1,100.00). CI-31618 had communicated with DORSEY, who was using telephone number 513-669-2337 and scob1700@icloud.com, to arrange the purchase of the firearm and machinegun conversion device.

7. Prior to this operation, SA-6134 was provided with ATF-issued funds for the purchase of evidence from DORSEY. SA-6134 and CI-31618 utilized an ATF undercover vehicle during the purchase of evidence from DORSEY.

8. On April 8, 2024, at approximately 12:35 p.m., audio/video recording equipment was activated for the purpose of documenting the purchase of evidence from DORSEY.

9. At approximately 12:54 p.m., DORSEY called CI-31618 and directed him/her to meet near 1661 Wickham Alley in Cincinnati, OH. DORSEY was observed by surveillance units outside of the apartment at 1661 Wickham Alley. DORSEY was observed knocking on the door of the building and then running to the back of the apartment complex out of the view of surveillance, SA-6134, and CI-31618. As DORSEY exited from view, an additional Black male, wearing a brown hooded sweatshirt was observed in the alley near the ATF undercover vehicle.

10. At approximately 12:59 p.m., DORSEY appeared from the side of the apartment complex located at the 1661 Wickham Alley and approached the ATF undercover vehicle.

11. DORSEY arrived at the ATF undercover vehicle and provided CI-31618 with a pistol and a machinegun conversion device. The previously observed unknown Black male wearing the brown hooded sweatshirt then approached DORSEY outside of the ATF undercover vehicle. DORSEY then told the unknown Black male, "Hey, go tell Tommy to get the extra clip."

12. SA-6134 then provided CI-31618 with one thousand one hundred dollars (\$1,100.00). CI-31618 provided the money to DORSEY for the pistol and machinegun conversion device.

13. At approximately 1:00 p.m., an individual later identified as TOMMY PAIGE III appeared from the side of the building located at 1661 Wickham Alley. PAIGE III joined DORSEY and FNU LNU outside of the ATF undercover vehicle.

14. At approximately 1:01 p.m., SA-6134 asked DORSEY if he could get more firearms, which DORSEY responded that he could get additional firearms.

15. SA-6134 and CI-31618 then departed from the area and returned to a predetermined staging location.

16. Upon returning to the predetermined staging location, the audio/video recording devices were deactivated, and a copy of the recordings were later entered into ATF Property. The items purchased from DORSEY were reviewed, entered into ATF Property, and are further described as follows:

- a. Glock, Model 21, .45 caliber semi-automatic pistol, Serial No. NYC506
- b. Glock "Switch" Machine Gun Conversion Device
- c. Ten (10) rounds of assorted ammunition



C. On April 9, 2024, two ATF Undercover Special Agents and an ATF Confidential Informant purchased a firearm and a bottle of Promethazine from JERMAINE DORSEY.

17. On April 9, 2024, SA-5342, SA-6134, and CI-31618, purchased a firearm and a bottle of Promethazine from JERMAINE DORSEY for one thousand one hundred dollars (\$1,100.00). The purchase from DORSEY on April 9, 2024, occurred at 1651 Queen City Avenue, Cincinnati, OH.

18. At approximately 11:57 a.m., the audio/video recording equipment was activated to document the purchase of a firearm and Promethazine from DORSEY. SA-5342, SA-6134, and CI-31618 departed a predetermined staging location to meet with DORSEY at 1651 Queen City Avenue.

19. At approximately 12:02 p.m., the ATF undercover vehicle arrived at 1651 Queen City Avenue. CI-31618 called DORSEY at telephone number 304-830-7500 but the call was not answered. DORSEY then immediately called back from 304-830-7500

and said he was across the street at the park. SA-5342 then observed two Black males dressed red clothing standing in the area described by DORSEY.

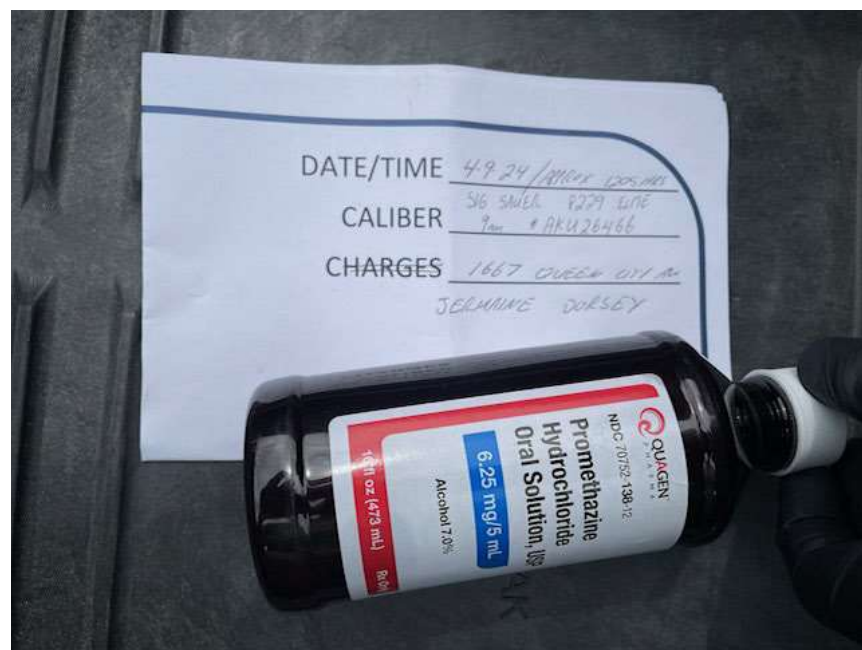
20. DORSEY then approached the ATF undercover vehicle and SA-5342 exited the vehicle, allowing DORSEY to enter the vehicle. DORSEY then provided CI-31618 with a firearm. At the same time, DORSEY removed a bottle of Promethazine from his jacket pocket. After negotiating the price of the firearm, CI-31618 provided DORSEY with nine hundred dollars (\$900.00) in ATF agent cashier funds.

21. SA-5342 then asked DORSEY about the bottle of Promethazine and how much he would sell it for. DORSEY stated he had already poured two ounces from the fourteen-ounce bottle and that he had paid two hundred ten dollars (\$210.00) for it. DORSEY agreed to sell the bottle with the remaining contents to SA-5342 for two hundred dollars (\$200.00). SA-5342 then provided DORSEY with two hundred dollars (\$200.00) in ATF agent cashier funds.

22. During the purchase of this firearm and Promethazine, DORSEY said he had another firearm available for sale but was waiting for his cousin to bring it to him from another area of town. SA-6134 told DORSEY the firearms were being taken to Chicago. DORSEY said he would call once he had the firearm in his possession. DORSEY then departed from the ATF undercover vehicle.

23. The ATF SAs and ATF CI then departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from DORSEY were entered into ATF Property, which are further described as follows:

- a. Sig Sauer, Model P229 Elite, 9mm caliber pistol, Serial No. AKU26466
- b. Bottle of suspected Promethazine



D. On April 10, 2024, JERMAINE DORSEY and JOSIAH WASHINGTON sold two firearms and ammunition to ATF Undercover Special Agents and an ATF Confidential Informant.

24. On April 10, 2024, SA-5342, SA-6134, and CI-31618, purchased two firearms and ammunition from DORSEY for one thousand three hundred dollars (\$1,300.00). Immediately before the purchase, DORSEY was observed obtaining the firearms from JOSIAH WASHINGTON. The purchase from DORSEY and WASHINGTON on April 10, 2024, occurred at 1651 Queen City Avenue.

25. At approximately 1:10 p.m., the audio/video recording equipment was activated to document the purchase firearms from DORSEY and WASHINGTON. SA-5342, SA-6134, and CI-31618 departed a predetermined staging location to meet with DORSEY and WASHINGTON at 1651 Queen City Avenue.

26. At approximately 1:13 p.m., CI-31618 called DORSEY at 304-830-7500. DORSEY answered and CI-31618 said they were on their way to meet at the park.

27. At approximately 1:22 p.m., SA-5342, SA-6134, and CI-31618, observed an unknown Black male – later identified as JOSIAH WASHINGTON² – walking towards the park. WASHINGTON was wearing blue jeans, a red hooded sweatshirt, and carrying a bag in his left hand. WASHINGTON then sat a table under the gazebo in the park. SA-5342 observed a large bulge in the front waistband of WASHINGTON'S clothing. SA-5342 along with SA - 6134 observed WASHINGTON remove a pistol from his waistband and place it into a black plastic bag. SA-5342, SA-6134, and CI-31618,

² On April 10, 2024, ATF Task Force Officers (TFO) Amber Bolte and Naomi Stewart reviewed social media and Ohio Law Enforcement Gateway (OHLEG) records and identified JOSIAH WASHINGTON. SA-5342 and SA-6134 reviewed a photograph of JOSIAH WASHINGTON and confirmed it was same person observed with DORSEY on April 10, 2024.

then left the area and would return a short time later, where WASHINGTON was observed still seated at the gazebo.

28. At approximately 1:42 p.m., SA-5342 observed DORSEY walking towards the ATF undercover vehicle, where he met CI-31618. DORSEY told CI-31618, “I’m bout to grab this real quick.” SA-5342 then observed DORSEY obtain a black bag from WASHINGTON and return to the ATF undercover vehicle, and WASHINGTON followed DORSEY. Upon arrival, WASHINGTON introduced himself to the ATF SAs and ATF CI as “Rock.”



29. DORSEY then placed the bag containing the firearms on the rear passenger floor of the ATF undercover vehicle. DORSEY removed both pistols from the bag and provided them to SA-5342. CI-31618 then provided DORSEY with one thousand three hundred dollars (\$1,300.00) in ATF agent cashier funds for the firearms. DORSEY was observed giving an unknown amount of the ATF agent cashier funds to WASHINGTON, and DORSEY also said he would give “Rock” an additional eighty dollars (\$80.00) when they returned to the apartment.



30. During the purchase of the firearms, SA-5342, SA-6134, and CI-31618 told DORSEY and WASHINGTON the purchased firearms were being transported to and sold in Chicago. DORSEY acknowledged these statements and said he would have more firearms for sale later that same day. DORSEY and WASHINGTON then departed from the ATF undercover vehicle.

31. The ATF SAs and ATF CI departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from DORSEY and WASHINGTON were entered into ATF Property, which are further described as follows:

- a. Girsan Regard MC, 9mm caliber pistol, Serial No. T6368-19A1022
- b. Smith & Wesson, Model M&P 9 Shield M2.0, 9mm caliber pistol, with an obliterated serial number
- c. Eighteen rounds of ammunition



E. On April 11, 2024, JERMAINE DORSEY sold a firearm and ammunition to two ATF Undercover Special Agents.

32. On April 11, 2024, SA-5342, SA-6134, and CI-31618, purchased a firearm and ammunition from DORSEY for nine hundred dollars (\$900.00). The purchase from DORSEY on April 11, 2024, occurred at 1651 Queen City Boulevard, Cincinnati, OH.

33. On April 11, 2024, prior to the activation of audio/video recording equipment, SA-6134 communicated with DORSEY at telephone number 513-706-3784 to arrange the purchase of the firearm.

34. At approximately 12:17 p.m., the audio/video recording equipment was activated to document the purchase of the firearm and ammunition from DORSEY. The ATF SAs and ATF CI departed from a predetermined staging location to meet with DORSEY at 1651 Queen City Boulevard.

35. At approximately 12:21 p.m., the ATF SAs and ATF CI arrived at 1651 Queen City Boulevard. DORSEY approached and entered the ATF undercover vehicle. DORSEY then removed a pistol from the front of his front pants area and provided it to the ATF SAs.

36. At approximately 12:24 p.m., DORSEY told the ATF SAs he had a machinegun conversion device, and the ATF SAs told DORSEY they would buy any machinegun conversion devices he had. DORSEY then asked what kind of firearms the ATF SAs were interested in obtaining. SA-6134 told DORSEY it did not matter if the firearms were stolen because all of the purchased firearms were being taken to Chicago. DORSEY acknowledged this statement with SA-6134.

37. ATF SA's provided DORSEY with nine hundred dollars (\$900.00) in ATF agent cashier funds for the firearm. DORSEY took the money and then departed from the ATF undercover vehicle.

38. The ATF SAs and ATF CI departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from DORSEY were entered into ATF Property, which are further described as follows:

- a. Glock, Model 22, .40 caliber pistol, Serial No. CNX975
- b. Fifteen rounds of ammunition



F. Later, also on April 11, 2024, JERMAINE DORSEY, while accompanied by DIAJONTE BANKS, sold two additional firearms and ammunition to three ATF Undercover Special Agents.

39. On April 11, 2024, SA-5342, SA-6134, and ATF Undercover Special Agent 5015 (SA-5015), purchased two firearms and ammunition from DORSEY for one thousand nine hundred sixty dollars (\$1,960.00). During this purchase, DIAJONTE BANKS, accompanied DORSEY and assembled the firearms that were sold to the ATF SAs. The purchase from DORSEY and BANKS on April 11, 2024, occurred at 1651 Queen City Boulevard, Cincinnati, OH.

40. On April 11, 2024, prior to the activation of the audio/video recording equipment, SA-6134 communicated with DORSEY at telephone number 513-706-3784 to arrange the purchase of firearms later that day.

41. At approximately 3:48 p.m., the audio/video recording equipment was activated to document the purchase of the firearms and ammunition from DORSEY and

BANKS. The ATF SAs departed from a predetermined staging location to meet with DORSEY and BANKS at 1651 Queen City Boulevard.

42. At approximately 3:51 p.m., the ATF SAs arrived at 1651 Queen City Boulevard and waited for DORSEY to arrive.

43. At approximately 4:11 p.m., a white Ford sedan, operated by an unknown Black male – later identified as DIAJONTE BANKS – and DORSEY arrived. DORSEY and BANKS exited the vehicle, and both met with the ATF SAs. DORSEY and BANKS went to the trunk of the vehicle where BANKS opened the tire compartment of the trunk. BANKS then assembled two firearms and gave them to DORSEY and the ATF SAs.



44. ATF SA's then provided DORSEY with one thousand nine hundred sixty dollars (\$1,960.00) in ATF agent cashier funds for the firearms.

45. At approximately 4:14 p.m., DORSEY told SA-6134 he had "two buttons" (a slang term for a machinegun conversion device) that he would sell the ATF UC in the future. DORSEY and BANKS then departed from the area.

46. The ATF SAs departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from DORSEY and BANKS were entered into ATF Property, which are further described as follows:

- a. Diamondback, Model DB15, multi-caliber rifle, Serial No. DB2041175
- b. Unknown manufacturer and model, .223 caliber rifle, with no visible serial number.



G. On April 15, 2024, JERMAINE DORSEY sold four firearms to ATF Undercover Special Agents and an ATF Confidential Informant.

47. On April 15, 2024, SA-5342, SA-6134, and CI-31618, purchased four firearms and ammunition from DORSEY for three thousand four hundred dollars (\$3,400.00). The purchase from DORSEY on April 15, 2024, occurred at 1651 Queen City Avenue, Cincinnati, OH.

48. On April 15, 2024, prior to the activation of audio/video recording equipment, SA-6134 communicated with DORSEY at telephone number 513-706-3784 to arrange the purchase of the firearms later that day.

49. At approximately 11:10 a.m., the audio/video recording equipment was activated to document the purchase of the firearms and ammunition from DORSEY. The ATF SAs and ATF CI departed from a predetermined staging location to meet with DORSEY at 1651 Queen City Avenue.

50. At approximately 11:13 a.m., the ATF SAs and ATF CI arrived at 1651 Queen City Avenue and waited for DORSEY to arrive.

51. At approximately 11:14 a.m., DORSEY arrived while operating a maroon-colored SUV. The vehicle was also occupied by an unknown female in the front passenger seat, and an unknown male in the rear driver's side seat, and a small child.

52. DORSEY exited the vehicle and met with the ATF SAs and ATF CI. As DORSEY opened the front door of his vehicle, SA-6134 observed multiple firearms on the driver's side floorboard. DORSEY then asked the male in the rear seat of the vehicle for a bag, which DORSEY obtained and proceeded to place the pistols in the bag.



53. DORSEY then provided the bag containing the four firearms to SA-6134. SA-6134 provided DORSEY with three thousand four hundred dollars (\$3,400.00) in ATF agent cashier funds for the firearms.

54. At approximately 11:18 a.m., DORSEY departed from the area.

55. The ATF SAs and ATF CI departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from DORSEY were entered into ATF Property, which are further described as follows:

- a. Smith & Wesson, Model SD40VE, .40 caliber pistol, Serial No. FBF5530
- b. Beretta, Model M9A3, 9mm caliber pistol, Serial No. B062162Z
- c. Glock, Model 23, .40 caliber pistol, Serial No. MMH810
- d. Taurus, Model G3, 9mm caliber pistol, Serial No. DD237864
- e. Fifty rounds of ammunition





H. On April 15, 2024, JOSIAH WASHINGTON sold a firearm and ammunition to ATF Undercover Special Agents and an ATF Confidential Informant.

56. On April 15, 2024, SA-5342, SA-6134, ATF Undercover Special Agent 5015 (SA-5015) and CI-31618, purchased a firearm and ammunition from WASHINGTON for one thousand four hundred dollars (\$1,400.00). The purchase from WASHINGTON on April 15, 2024, occurred at 3003 Reading Road, Cincinnati, OH.

57. On April 15, 2024, prior to the activation of audio/video recording equipment, SA-6134 communicated with WASHINGTON at 304-830-7500 to arrange the purchase of the firearm later that day.

58. At approximately 6:05 p.m., the audio/video recording equipment was activated to document the purchase of the firearm and ammunition from WASHINGTON. The ATF SAs and ATF CI departed from a predetermined staging location to meet with WASHINGTON at the 3003 Reading Road.

59. At approximately 6:09 p.m., the ATF SAs and ATF CI arrived at 3003 Reading Road. WASHINGTON approached the ATF undercover vehicle approximately a minute later and handed SA-6134 a blue bag containing a firearm.



60. SA-6134 provided WASHINGTON with one thousand four hundred dollars (\$1,400.00) in ATF agent cashier funds for the firearm. SA-6134 told WASHINGTON all the firearms they were purchasing were going to Chicago, and SA-6134 asked WASHINGTON about obtaining any “buttons,” a slang term for machinegun conversion devices.

61. At approximately 6:13 p.m., WASHINGTON departed from the ATF undercover vehicle.

62. The ATF SAs and ATF CI departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from WASHINGTON were entered into ATF Property, which are further described as follows:

- a. Romarm/Cugir, Model Draco, 7.62x39 caliber pistol, Serial No. ROA22DG-6976
- b. Twenty rounds of ammunition



I. On April 17, 2024, JERMAINE DORSEY sold a firearm with a machinegun conversion device and ammunition to ATF Undercover Special Agents and an ATF Confidential Informant.

63. On April 17, 2024, SA-5342, SA-6134, and CI-31618, purchased a firearm with an attached machinegun conversion device and ammunition from DORSEY for one thousand six hundred dollars (\$1,600.00). The purchase from DORSEY on April 17, 2024, occurred at 1663 Wickham Alley, Cincinnati, OH.

64. On April 17, 2024, prior to the activation of audio/video recording equipment, SA-6134 communicated with DORSEY at telephone number 513-866-0380, to arrange the purchase of the firearm and ammunition later that day.

65. At approximately 4:28 p.m., the audio/video recording equipment was activated to document the purchase of the firearm and ammunition from DORSEY. The ATF SAs and ATF CI departed from a predetermined staging location to meet with DORSEY at 1663 Wickham Alley.

66. At approximately 4:34 p.m., the ATF SAs and ATF CI arrived at 1663 Wickham Alley. The ATF SAs and ATF CI observed four unknown males walking down the alley toward the ATF undercover vehicle. The ATF SAs and ATF CI then departed from the area.

67. At approximately 4:37 p.m., SA-6134 called DORSEY at 513-866-0380 to determine his location. SA-6134 told DORSEY there were too many people around, and DORSEY responded in sum and substance, “...nah nah I had to walk...got it on me, I came through the cut I saw the boys (Police)...those are my brothers...I was with them, I’m right here...I told you I’m trying to tell you...”

68. At approximately 4:45 p.m., the ATF SAs and ATF CI returned to 1663 Wickham Allen in the ATF undercover vehicle. DORSEY approached the vehicle, removed a pistol from his waistband, and provided it to SA-6134 by placing it on the floorboard of the ATF undercover vehicle.

69. At approximately 4:46 p.m., SA-6134 told DORSEY that the firearms were all going to Chicago. DORSEY responded to SA-6134 by saying in sum and substance, “...Make sure you clean them bitches up...” SA-6134 then provided

DORSEY with one thousand six hundred dollars (\$1,600.00) in ATF agent cashier funds for the firearm. DORSEY then departed from the ATF SAs and ATF CI.

70. The ATF SAs and ATF CI departed from the area and returned to a predetermined staging location. The audio/video recording devices were deactivated, and the items purchased from DORSEY were entered into ATF Property, which are further described as follows:

- a. Glock, Model 21, .45 caliber pistol, Serial No. HVK482
- b. Twenty-nine rounds of ammunition

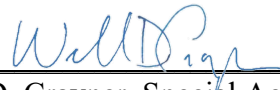


J. JERMAINE DORSEY and JOSIAH WASHINGTON are not Federal Firearms Licensees.

71. On April 22, 2024, ATF Industry Operations Area Supervisor (AS) William Halusek queried ATF databases to determine if DORSEY and WASHINGTON were current Federal Firearm Licensee (FFL); was a former FFLs; or have pending

applications to become FFLs. AS Halusek determined that neither DORSEY and WASHINGTON are not a pending, current, or former FFL.

72. Based on the foregoing, I believe there is probable cause to show that DORSEY, BANKS and WASHINGTON trafficked and conspired to traffic in firearms in violation of 18 U.S.C. § 933 – Trafficking in Firearms and 18 U.S.C. §371 – Conspiracy to Commit Offense or to Defraud United States, in the Southern District of Ohio.



William D. Crayner, Special Agent
Bureau of Alcohol, Tobacco, and Firearms

Subscribed and sworn to before me this **24** day of April 2024


Karen L. Litkovitz
United States Magistrate Judge